DECLARATION OF ROBERT VAUGHN YOUNG

I, Robert Vaughn Young, declare as follows:

1. I am over 18 years of age. I am a resident of Seattle, Washington. The matters set forth herein are of my own personal knowledge and I would be capable of testifying if called to do so.

2. Because I have over 20 years as a staff member in Scientology, most of it as an executive and as part of the elite "inner circle," I am most familiar with this organization and its tactics. I fled with my wife in 1989. For the last year and a half, I have served as an expert legal consultant on Scientology in several cases, including the case of Church of Scientology International (CSI) v. Steve Fishman and Uwe Geertz (91-6426-HLH [Tx] [C.D.Cal.]) where once again Scientology clogs the courts with alarming and misleading facts and blatant false testimony in a last-ditch attempt to discredit my testimony as well as that of my wife, Stacy Brooks Young.

3. Because my wife and I have 35 years in Scientology between us, we have considerable knowledge how this organization operates. We presented not only our experience but Scientology documents to show how Scientologists are permitted to lie and cheat in the name of Scientology. It is their notorious "Fair Game Doctrine" that I detailed earlier with their own writings that allows them to violate the law with an end-justifies-the-means attitude that they are above the law, that the law must be used to harass and destroy, rather than win suits. That is why they withdrew from this case and now why they continue to fight: to harass defendant Geertz, his counsel and his experts consultants. It is why they fanatically harass others who oppose them.

4. In the named declaration, Rinder tries to say that they met with my wife and me to "set the record straight." Let me clarify this. For over one month, Mike Sutter of the Religious Technology Center (RTC) called me, almost daily, pleading with me

to meet with them, saying it would be "well worth [my] while" to do so. I declined but he persisted, week after week. He and Mike Rinder (of Plaintiff CSI) even appeared on my front lawn, tapping on my windows, trying to meet with me, insisting that it would be worth my time, clearly implying that they wanted to pay me money. I continued to decline to meet with them or even discuss the matter. They called my wife, badgering her with the same story. So the idea that they met with us to give us the opportunity to "set the record straight" is a complete fabrication. They wanted to meet with us to pay us money to change our testimony.

5. At my wife's request, we met with them in Seattle. They told us that they wanted to get declarations sealed or removed but they had no other avenue left but us. I told them they should talk to Geertz's attorney Graham Berry. They called him names and said there was no value in doing that. I told them they should talk to defendant Geertz. They did the same towards him, calling him "crazy." They said if we helped them to seal the records or get them removed, they would "help" us. When we began to balk, they gave veiled threats of the power of the organization, how it could be used to destroy us unless we accepted their offer and made a new declaration. They would not say what the new declaration would say or what "agreement" I would have to sign. This went on for days so I played along with them to see what it might be.

6. I wanted to see what "agreement" they would insist on and what they wanted me to say to "set the record straight" because Vicki and Rick Aznaran had earlier met with Sutter and Rinder and had "recanted" their declarations and were now making ridiculous statements on behalf of Scientology. I had heard that the Aznarans had been paid a large amount of money to retract their testimony and to "help" Scientology instead. Thus I wanted to see what the Sutter and Rinder approach was and how they might buy off a witness or potential witness.

7. During days of talking with them, it was difficult at times to even stay in the same room with them and a couple of times the meetings were very short. I simply had to call them off because I couldn't stomach their sense of reality. But I kept coming back because I wanted to see their offer for they had made it plain that they would not show us anything unless they were convinced that we were "sincere" and if I walked out, they wouldn't let me see their cards. They finally asked us to draft what we might say to "set the record straight." Since we had no intention of making such a statement, we took a couple of days "working on it" and came back saying we were "having trouble" with the idea and could they offer us any direction or ideas? They finally showed us "notes" of what they wanted us to sign for $200,000.

8. Until this time, the meetings had been held at our home, except for the very first day. But I had asked that this meeting (when they showed us their ideas and the agreement) be at their room at the Doubletree Inn for I wanted a place to walk out of, for I knew what was about to happen. And I knew that if they were in my home, they would have refused to leave and would have continued to press the issue. They showed us what they wanted us to declare for money. Basically they said that we had lied, that we were sorry for what we had done, that Graham Berry had put us up to all of it, that we had done it only for money, etc. In short, exactly what Rinder has now tried to claim. There was one set for me and one for Stacy. We read each other's. It was everything I could do to hold my temper at their sheer criminal arrogance. We had told them time and again that everything we had said was true, that Berry had not written anything for us, etc., and now it was as if nothing had been said. I saw that they really thought they could simply buy our testimony.

9. I knew that if I blew it then, they would not show me the "agreement" so I said I wanted to talk to Stacy privately. We went out and agreed to hedge more so we could see their "agreement." We went back in and when asked what we thought, Stacy said how their points "need some editing" but they were "in the ballpark."

Wanting a copy of it (so I could file it in court) I asked if we could make a copy of this so we could write our declarations. They declined.

10. I then asked to see the "agreement." They showed it to us. Unlike the earlier document, this was a full legal paper that we could have signed right then. It said that we would no longer work on any Scientology matters, that we would never talk about the subject publicly, that we would never write about it, that we could not meet with other former Scientologists, etc. In other words, we were being asked to give up all of our basic Constitutional Rights. It also said we would "help" them to get the rest of the material in the Fishman-Geertz case removed from the records. When I saw that, I knew that was how they had hooked the Aznarans. It explained why the Aznarans continue to file declarations: they are "helping" according to their Faustian contract, i.e., saying whatever Scientology wants them to say.

11. When Stacy and I had read what amounted to a gag order, we went out and talked and that was when we agreed that it was time to end the meeting. We went back in and did. Sutter and Rinder both tried to convince us to stay and talk about it some more but we refused and went home. They were supposed to fly out that day.

12. They called us a few hours later, trying to meet with us again. We refused. They apparently flew back to Los Angeles. And for the next week, they continued to call us, asking us to meet with them again, promising that they would make it "even better" for us, which I assumed meant more than the $200,000. We refused to meet with them or discuss it.

13. There are several points I want to make about these meetings. First, it was Scientology that sought the meetings and Scientology that made the offer that we change our testimony. It was Scientology representatives that threatened that they would "do anything" needed to destroy our credibility and to take us out of the case.

14. During the meetings, at one point Rinder finally confessed to me that my wife and I are under continuing surveillance. We were sitting out on the sea wall and I was

remarking on the private investigators following me and Rinder tried to deny it. Come on, Rinder, I said. You're not talking to a newcomer! I was in there for 20 years! I know how it works! Finally, he went, "Okay, okay. So there are PI's [private investigators] all over you."

15. I have read my wife's declaration of this date. Her account of the meetings are accurate, drawn with her own perspective and her emotions. Like her, I stand by all of my earlier declarations, especially those that detail how Scientology is supposed to abuse the legal system to achieve its ends. That is what they are doing here.

16. Part of Rinder's problem is that he bought our tactic on the final day when we wanted to see their proposed declaration and the gag order. His other problem is that he has to follow orders to do everything he can to destroy our repute and thus he must twist the facts and even lie. Then again, I don't know how much he even believes any more. My conversations with him shows that he is fully in the grip of the cult, as is his family and thus he no longer has the ability or the courage to do anything else. This is sad. That he would take the last shreds of our friendship and use it in this way is sad. But it is also in keeping with what he bluntly told us in our home: "There is nothing I wouldn't do to protect Scientology. Nothing."

I declare under penalty of perjury and the laws of the United States and the State of Washington that the foregoing is true and correct.

Executed this 14th day of December, 1994, in Seattle, Washington.

Robert Vaughn Young